

**UNITED STATES DISTRICT COURT
FOR NORTHERN DISTRICT OF TEXAS**

SOUTHWEST MARINE & GENERAL
INSURANCE COMPANY, as assignee and
subrogee of My Community Credit Union,

Plaintiff,

v.

TAMMION VALENTINE and VALENTINE
TRAVEL EXPRESS LLC,

Defendants.

No. 3:24-cv-00013-B

**PLAINTIFF'S REQUEST TO DISMISS DEFENDANT, VALENTINE TRAVEL
EXPRESS LLC WITHOUT PREJUDICE AND FOR DEFAULT JUDGMENT TO BE
ENTERED AGAINST DEFENDANT, TAMMION VALENTINE**

Plaintiff, Southwest Marine & General Insurance Company, by and through its attorneys, McElroy, Deutsch, Mulvaney & Carpenter, LLP, requests that this Honorable Court (1) dismiss the claims against Defendant, Valentine Travel Express LLC, without prejudice; and (2) enter default judgment in its favor and against Defendant, Tammion Valentine, as set forth in Plaintiff's Motion for Default Judgment (Docket No. 11) which remains pending.

**McELROY, DEUTSCH, MULVANEY &
CARPENTER, LLP**

Dated: July 3, 2024

By: /s/ Matthew A. Lipman
Matthew A. Lipman, Esq.
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General Insurance Company*

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CERTIFICATE OF SERVICE

I hereby state that on July 3, 2024, I served a true and correct copy of the foregoing documents on the following via first class mail:

Ms. Tammion Valentine
12701 Purdue Drive
Balch Springs, TX 75180

Valentine Travel Express LLC
c/o Tammion Valentine
12701 Purdue Drive
Balch Springs, TX 75180

By: /s/ Matthew A. Lipman
Matthew A. Lipman, Esquire